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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re: FINGER LAKES CAPITAL PARTNERS, LLC, Debtor.	Chapter 11 Case No. 16-22112 (RDD)
JEFFREY KESWIN, Plaintiff - against - FINTER LAKES CAPITAL PARTNERS, LLC, V. ZUBIN MEHTA, and GREGOTRY SHALOV, Defendants.	Adv. Pro. No. 16-08212-rdd

DECLARATION OF JAIME B. LEGGETT IN SUPPORT OF OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

JAIME BURTON LEGGETT, hereby declares:

1. I am an associate at the firm of Storch Amini PC, counsel of record to Jeffrey Keswin ("Keswin") in the above-captioned proceeding. This declaration is based upon my personal knowledge and my review of the firm's records for these matters. I submit this

declaration in support of Keswin's opposition to Defendants' motion for summary judgment (the "Motion").

1. Attached to this affidavit as Exhibit 1 is a true and correct copy of the Affidavit of Jeffrey Keswin, sworn to June 22, 2015, and its accompanying exhibits.

2. Attached to this affidavit as Exhibit 2 is a true and correct copy of the Defendants' cross-motion to dismiss or stay the State Court action and opposition to Keswin's motion for summary judgment, which was filed in the action in New York State Supreme Court (the "State Court").

3. Attached to this affidavit as Exhibit 3 is a true and correct copy of the Keswin's opposition to Defendants' cross-motion to dismiss or stay the action, which was filed in the State Court.

4. Attached to this affidavit as Exhibit 4 is a true and correct copy of the State Court's October 13, 2015 decision to stay the action pending disposition of the Delaware Action.

5. Attached to this affidavit as Exhibit 5 is a true and correct copy of the State Court's December 2, 2015 order denying the Defendants' motion to dismiss and Keswin's motion for judgment on the pleadings.

6. Attached to this affidavit as Exhibit 6 is a true and correct copy of the so-ordered transcript of the December 2, 2015 hearing before the State Court.

7. On January 28, 2015, the Delaware Chancery Court overseeing the proceeding captioned as Finger Lakes Capital Partners, LLC v. Honeoye Lake Acquisition, LLC, and Lyrical Opportunity Partners, L.P., C.A. No. 9742-VCL (Del. Ch.) (the "Delaware Action") held a hearing on FLCP's motion for judgment on the pleadings on January 28, 2015. A true and correct copy of the relevant portions of the hearing transcript is attached hereto as Exhibit 7.

8. On April 27, 2015, Shalov testified under oath at his deposition in the Delaware Action. A true and correct copy of the relevant portions of the trial transcript is attached hereto as Exhibit 8.

9. On June 15, 2015, Mehta testified under oath at the trial in the Delaware Action. A true and correct copy of the relevant portions of the trial transcript is attached hereto as Exhibit 9.

10. On June 16, 2015, Shalov testified under oath at the trial in the Delaware Action. A true and correct copy of the relevant portions of the trial transcript is attached hereto as Exhibit 10.

/s/ Jaime Leggett
JAIME B. LEGGETT